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June 14, 2024

**VIA ECF**

Hon. Victoria Reznik  
United States District Judge  
Southern District of New York  
300 Quarropas Street, Room 420  
White Plains, NY 10601-4150

Re: *Natalie Grainger v. Westchester Country Club, Inc., et al.*  
Civil Action No. 7:23-cv-01802

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Dear Judge Reznik:

This firm represents Defendants Westchester Country Club Inc., Mark Christiana and Tom Nevin (collectively, “Defendants”) in connection with the above referenced matter. We write jointly with counsel for Plaintiff Natalie Grainger (“Plaintiff”) to provide an update as to the status of outstanding discovery in this matter and the parties’ ongoing efforts to meet and confer with respect to same in accordance with Your Honor’s directives at the May 29, 2024 status conference.

The Parties have agreed, subject to Your Honor’s approval, to extend the deadline for completion of fact discovery until July 31, 2024. This deadline will allow the Parties time to complete the remaining party discovery, including those related to Defendants’ after-acquired evidence defense. With respect to non-party discovery, presently, there are two (2) non-party depositions outstanding. The Parties have met and conferred with respect to Plaintiff’s objections to Defendant’s non-party subpoenas, and have resolved the majority of the objections raised by Plaintiff, with the exception of the subpoena issued to Chelsea Piers. Plaintiff has filed a motion to quash that subpoena, and Defendants will file their response to this motion by Monday, June 17, 2024 in accordance with Your Honor’s Individual Practice Rules. Additionally, Defendants have filed a motion to compel non-party Peer Pedersen to comply with the subpoena issued to him, and the Parties are appearing before Your Honor on Monday, June 17, 2024 to address same.

With respect to expert discovery, as the undersigned advised Your Honor at the May 29, 2024 status conference, the documents sought in Defendants’ non-party subpoena issued to T-Position LLC have a direct bearing on Defendants’ anticipated expert disclosures. Plaintiff provided documents responsive to the T-Position subpoena yesterday. The undersigned is in the process of reviewing these documents to determine whether the production is sufficient and if Court intervention will be necessary to resolve issues related to this subpoena. The Parties respectfully request that Your Honor set a deadline of June 28, 2024 to provide a further status update to the Court as to the status of these efforts and to submit a proposed schedule for expert discovery.

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In sum, the Parties respectfully request that Your Honor enter an order: (1) extending the deadline for completion of fact discovery until July 31, 2024; and (2) directing the Parties to submit a status update with respect to the expert discovery issues on or before June 28, 2024.

We thank Your Honor for the Court's time and consideration in this matter. Should Your Honor have any questions or require additional information, please do not hesitate to contact the undersigned.

Respectfully submitted,

GORDON REES SCULLY  
MANSUKHANI, LLP

By: /s/ John T. Mills  
John T. Mills

CC: All Counsel of Record (via ECF)